



March 11, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20544

Re: Ex Parte, CC Docket 94-102

Dear Ms. Dortch:

On March 10, 2005, Mary Brooner, Senior Director, Telecommunications Strategies of Motorola met with Commission staff concerning GPS in GSM handsets. This meeting was at the request of the Wireless Telecommunications Bureau and attending for the Bureau were: Catherine Seidel, Nicole McGinnis, Michael Wilhelm, Jeff Cohen and Angela Giancarlo.

Motorola advised the FCC that it has no location-capable GSM handset in the U.S. market today. Motorola indicated that a future driver for GPS in GSM handsets may be competition among carriers for location-based consumer services. Motorola noted, however, that GPS in GSM handsets does not in itself assure that public safety accuracy levels would be achieved by the carriers. Without up-grades to the network, it is unclear that the accuracy levels mandated by the Commission for E911 would be met.

Motorola advised the FCC that it is feasible today to build GPS in GSM for commercial requirements. Motorola has commercially available one GSM handset model with GPS in a market in Asia where the carrier customer offers commercial location-based services. Motorola noted that a GSM handset with GPS is slightly larger, may have a shorter battery life, and that there is an added cost increment.

Sincerely,

/s/ Mary E. Brooner

Mary E. Brooner  
Senior Director  
Telecommunications Strategies  
Government Relations Office

cc: Catherine Seidel  
Nicole McGinnis  
Michael Wilhelm  
Jeff Cohen  
Angela Giancarlo